

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

ALEXANDER E. JONES,

Debtor.

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§ Chapter 7

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§ Case No. 22-33553 (CML)

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TRUSTEE'S MOTION TO DISBURSE DEPOSITS AND SALE PRICE
[Relates to Docket No. 859]

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

Christopher R. Murray, in his capacity as the chapter 7 trustee (the “*Trustee*”) for the bankruptcy estate (the “*Chapter 7 Bankruptcy Estate*”) of Alexander E. Jones (“*Alex Jones*” or the “*Debtor*”), files the *Trustee’s Motion to Disburse Deposits and Sale Price* (the “*Motion*”), and in support thereof would respectfully show the Court as follows:

The Trustee seeks entry of an Order substantially in the form attached hereto (the “*Deposit Release Order*”) directing the return of deposits made by two bidders, First United American Companies, LLC (“*FUAC*”) and Global Tetrahedron LLC (“*GT*”, and together with FUAC, the “*Bidders*”) and cash portion of the sale price deposited by GT and held by the Trustee.

On August 22, 2024, the Trustee filed the *Trustee’s Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Dkt. No. 829] seeking the Court’s

approval of the auction and sale of non-cash assets of Free Speech Systems (“**FSS**”) free and clear of all liens, claims, and encumbrances, and granting related relief.

On September 25, 2024, the Court entered an *Order Granting the Trustee’s Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC* [Dkt. No. 859] (the “**Winddown Order**”). Pursuant to the Winddown Order, the Trustee received good faith deposits from FUAC and GT in the amounts of \$120,000.00 and \$100,000.00 respectively. In addition, GT also transferred \$1,750,000.00 representing the cash portion of the purchase price to the Trustee in connection with the proposed sale of FSS assets.

On November 18, 2024, the Trustee filed the *Trustee’s Expedited Motion for Entry of an Order in Furtherance of the Sale of Assets of Free Speech Systems, LLC* [Dkt. No. 915] (the “**Sale Motion**”). But the Sale Motion was denied, and the Court entered the *Order Denying Trustee’s Expedited Motion for Entry of an Order in Furtherance of the Sale of Assets of Free Speech Systems, LLC* [Dkt. No. 985] on December 11, 2024.

Because (i) the Sale Motion was denied, and neither of the Bidders were authorized to purchase the non-cash assets of FSS and (ii) the Trustee is no longer pursuing a sale of those assets to either FUAC or GT, the Trustee now seeks to disburse both the deposits and the sale price in accordance with the Winddown Order.

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Dated this 12th day of February 2025.

Respectfully submitted,

By: /s/ Joshua W. Wolfshohl

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COUNSEL TO

CHRISTOPHER R. MURRAY,

CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I certify that on February 12, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl